DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

FOI

Food and Drug Administration
Rockville MD 20857

FEB 14 1997

TRANSMITTED VIA FACSIMILE

Edward L. Zimney, M.D.
Director, Medical Regulatory Affairs
Immunex Corporation
51 University Street
Seattle, Washington 98101

RE: NDA 19-297/S-014
Novantrone (mitoxantrone)
MACMIS # 5150

Dear Dr. Zimney:

Reference is made to promotional materials submitted by Immunex Corporation (Immunex) under cover of FDA Form 2253, dated January 29, 1997. Specifically, we refer to World Wide Web pages promoting Novantrone for advanced hormone refractory prostate cancer (HRPC). The Division of Drug Marketing, Advertising and Communications (DDMAC) has determined that they promote Novantrone in a manner in violation of the Federal Food, Drug and Cosmetic Act. Our specific objections are outlined below.

FALSE AND/OR MISLEADING AND UNSUBSTANTIATED CLAIMS

In a paragraph entitled "Your Treatment Choices," Immunex states **"Until now, pain treatment choices have been limited."** The statements that follow detail the disadvantages of other pain relief measures that could be employed in advanced HRPC patients, such as sleepiness, sluggishness and constipation.

The next paragraph states,

> **"Today, there's a new kind of treatment that provides more effective and longer-lasting pain relief for many people. Yet the side effects are generally well tolerated. So patients get more out of life."**

These claims and their presentation are false and/or misleading for the following reasons:

(1) they suggest that Novantrone has a safety profile superior to other methods of pain relief, which is an unsubstantiated claim.

(2) they suggest that Novantrone is the solution to the problems patients may experience with

other analgesics. Immunex even entitles the next paragraph that describes Novantrone, "A New Answer For Pain Relief." In fact, these same adverse effects have been observed with Novantrone; fatigue in 39% and constipation in 16% of patients treated with Novantrone.

(3) Novantrone is a cytotoxic chemotherapeutic drug with many significant serious risks, including a boxed warning, associated with use of the drug. This presentation suggests that these risks do not exist. To suggest that a cytotoxic chemotherapeutic agent with significant and serious toxicities is better tolerated than analgesics defies common sense and is misleading.

(4) it has not been demonstrated that Novantrone is more effective than narcotic analgesics for relief of pain in HRPC; therefore the claim is unsubstantiated and false and/or misleading.

"...these studies show that Novantrone is generally well tolerated by the patients, which is an important advantage for older patients who may be more troubled by side effects."

Immunex has submitted no evidence to suggest that Novantrone offers any safety advantage over any other pain medication which older patients might receive; therefore, this claim is unsubstantiated and misleading.

"Side effects with Novantrone are usually not severe enough to seriously affect quality of life..."

Immunex has submitted no evidence to support this statement, and therefore this claim is unsubstantiated and false and/or misleading.

The entire promotional piece is lacking in fair balance because of the above misleading representations of the toxicity profile of Novantrone, and because of a failure to accurately present the actual toxicity profile in a manner reasonably comparable in prominence to that of positive claims about the drug. Immunex has been notified by DDMAC on two previous occasions for failing to provide fair balance in promotional materials.

Immunex should immediately cease distribution and use of this and other similar promotional materials for Novantrone that contain the same or similar claims and representations. Immunex should notify DDMAC of its intent and plans to comply with the above. Please respond by February 24, 1997, addressing your response to the undersigned at the Division of Drug Marketing, Advertising and Communications, 5600 Fishers Lane, HFD-40, Rockville, Maryland 20857. DDMAC reminds Immunex that only written communications are considered official.

In all correspondence regarding this particular issue, please refer to MACMIS ID# 5150 in addition to the NDA number.

Sincerely,

Tracy L. Acker, Pharm.D.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

File Name:novantrone\NOVWEB.PGS

Drafted: Acker	2/14/97
Comment: Hankin	2/14/97
Comment:Abrams	2/14/97
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CC:
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Due Date: February 24, 1997

Close Out: No

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